

STEPHANIE M. HINDS (CABN 154284)
United States Attorney
MICHELLE LO (NYBN 4325163)
Chief, Civil Division
MICHAEL A. KEOUGH (NYRN 5199666)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6878
FAX: (415) 436-6748
michael.keough@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALERIE A. HOLLENBACK,)	CASE NO. 3:19-cv-00151-MMD-CSD
Plaintiff,)	
v.)	STIPULATED DISCOVERY PLAN AND
)	SCHEDULING ORDER
MERRICK GARLAND, in his official capacity)	
as Attorney General of the United States,)	
Defendant.)	

Valerie Hollenback, plaintiff *pro se*, and counsel for Defendant, Merrick Garland, hereby
STIPULATE and agree that the following discovery plan shall govern the case and respectfully request
that the Court enter a scheduling order as follows:¹

1. **Initial Disclosures.** Initial disclosures shall be made no later than **April 12, 2022**. The disclosures shall comply with Federal Rule of Civil Procedure 26(a). The disclosures shall include:
 - a. the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

¹ Per the Court's instructions at the March 29, 2022 scheduling conference, the parties held a Rule 26(f) conference on March 29, 2022.

- b. a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment; and
- c. a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

2. **Discovery Cut-Off Date.** The cut-off for all discovery in this case shall be **August 31, 2022**. All depositions must be properly noticed and taken prior to the discovery cut-off, and any requests for written discovery must be served sufficiently in advance of the discovery cut-off date such that any response is due prior to August 31, 2022.

3. **Amending the Pleadings and Adding Parties.** The deadline for filing motions to amend pleadings is **June 2, 2022**.

4. **Expert Disclosures.** Any expert disclosures (including expert reports) must be made by **July 1, 2022**. Any rebuttal expert disclosures must be made by **August 1, 2022**. Any expert depositions must be completed prior to the August 31, 2022 discovery cut-off.

5. **Dispositive Motions.** Dispositive motions are due by **September 30, 2022**.

6. **Hearing on Dispositive Motions, Pretrial Order.** Any dispositive motions will be heard on **November 1, 2022** or as soon thereafter as the Court is available. The deadline for filing the joint pretrial order shall be 30 days after the decision on the dispositive motions or further court order. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the joint pretrial order.

7. **Alternative Dispute Resolution.** The parties previously availed themselves of the Court's early neutral evaluation (ENE) process. The ENE was held on March 9, 2022, but no settlement was reached.

8. **Alternative Forms of Case Disposition.** The parties certify that they have considered

consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

Dated: April 4, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney
Northern District of California

/s/ Michael A. Keough
MICHAEL A. KEOUGH
Special Assistant United States Attorney

Acting Under Authority
Conferred by 28 U.S.C § 515

/s/ **Valerie Hollenback
VALERIE HOLLENBACK
Plaintiff *Pro Se*

***Pursuant to Local Rule LR IC 5-1, the filer of this document attests that all parties have concurred in the filing of this document*

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ORDER

IT IS SO ORDERED.

Date: April 4, 2022


HON. CRAIG S. DENNEY
UNITED STATES MAGISTRATE JUDGE